

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re:)	Chapter 11
)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	Case No. 22-10943 (MEW)
)	
Debtors. ¹)	(Jointly Administered)
)	

**SUPPLEMENTAL DECLARATION OF CHRISTOPHER PEASE IN
CONNECTION WITH THE EMPLOYMENT OF HARNEY WESTWOOD &
RIEGELS LP AS BVI COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF VOYAGER DIGITAL HOLDINGS, INC., *ET AL.***

Pursuant to 28 U.S.C. § 1746, I, Christopher Pease, do hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a Partner employed in the Dispute Resolution department of Harney Westwood & Riegels LP (“Harneys”), located at Cragmuir Chambers, Road Town, Tortola, British Virgin Islands (“BVI”). There are no disciplinary proceedings against me.
2. I submit this supplemental declaration (the “Supplemental Declaration”), pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure, to supplement the disclosures contained in (i) my original declaration (the “Original Declaration”), attached as Exhibit B to the *Application for Order Authorizing the Employment and Retention of Harney Westwood & Riegels LP as BVI Counsel to the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., et al., Effective as of July 31, 2022* [Docket No. 608] (the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Voyager Digital Holdings, Inc.’s and Voyager Digital Ltd.’s principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003. Voyager Digital, LLC’s principal place of business is 701 S. Miami Ave, 8th Floor, Miami, FL 33131.

“Application”).² Except as otherwise set forth herein, this Supplemental Declaration does not replace anything in the Application or the Original Declaration.

3. On November 15, 2022, the Court entered an order authorizing the retention and employment of Harneys as BVI counsel to the Committee [Docket No. 642] (the “Order”). The Order provides that Harneys shall file a supplemental declaration and provide ten business days’ notice to the Debtors, the United States Trustee, and any official committee prior to any increases in Harneys’ rates for any individuals retained by Harneys and providing services in these cases.

4. Paragraph 17 of the Application disclosed the hourly rates charged by Harneys for professionals and paraprofessionals employed in its offices, as of the filing of the Application. Paragraph 17 of the Application also discloses the names, positions, and applicable hourly rates of the Harneys lawyers then expected to have primary responsibility for providing services to the Committee, as of the filing of the Application.

5. Effective January 1, 2023, the hourly rates charged by Harneys for professionals and paraprofessionals employed in its office will increase as set forth below:

Billing Category	2022 Range	2023 Range
Partners	Up to \$1,050	Up to \$1,100
Associates / Counsel	\$400 – \$800	\$500 - \$800
Paralegals	\$175 – \$275	\$150 - \$275

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Original Declaration.

6. Effective January 1, 2023, the applicable hourly rates of the Harneys attorneys who have worked or are expected to work on the engagement are as follows:

Lawyer	Position/Department	2022 Hourly Rate	2023 Hourly Rate
Peter Ferrer	Partner/ Litigation, Restructuring & Insolvency	\$1,050	\$1,100
Christopher Pease	Partner/ Litigation, Restructuring & Insolvency	\$925	\$1,000
Gabriel Adedeji	Senior Associate / Litigation, Restructuring & Insolvency	\$650 ³	\$650
Megan Elms	Associate/ Litigation, Restructuring & Insolvency	\$420	N/A ⁴
Zachary Van Horn	Associate/ Litigation, Restructuring & Insolvency	N/A ⁵	\$650

7. These rates are reasonable based on the customary compensation charged by comparably skilled practitioners in large chapter 11 cases. The Committee has consented to the rate increases as reasonable.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: December 19, 2022

/s/ Christopher Pease
Christopher Pease
Partner
Harney Westwood & Riegels LP

3 Gabriel Adedeji began providing services on this matter in December 2022.

4 Ms. Elms transferred out of Harneys' BVI office and is unlikely to be providing services on this matter going forward.

5 Zachary Van Horn did not provide any services on this matter in 2022.

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of December 2022, I caused a true and correct copy of the foregoing *Supplemental Declaration of Christopher Pease in Connection with the Employment of Harney Westwood & Riegels LP as BVI Counsel to the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., et al.* to be served on the Service List via (i) electronic notification pursuant to the CM/ECF system for the United States Bankruptcy Court for the Southern District of New York, (ii) e-mail, or (iii) First Class U.S. Mail, as indicated in the attachment hereto.

/s/ Darren Azman
Darren Azman

Name	Attention	Address 1	Address 2	City	State	Zip	Country	Email	Method of Service
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NEW JERSEY BUREAU OF SECURITIES	C/O MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP	ATTN: NICOLE LEONARD	225 LIBERTY STREET, 36TH FLOOR	NEW YORK	NY	10281		NLEONARD@MDMC-LAW.COM	VIA ECF
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